


Application **GRANTED**. The initial pretrial conference scheduled for September 4, 2024, is adjourned to **September 25, 2024**, at 4:00 P.M. At that time, the parties shall call 888-363-4749 and use the access code 558-3333. The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order is extended to **September 18, 2024**, at 12:00 P.M.

BY ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Dated: August 29, 2024
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Ramos, et al. v. Banks, et al.*, 24-cv-5109 (LGS)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, attorney for Defendants the New York City Department of Education (“DOE”) and DOE Chancellor David Banks in the above-referenced action. I write jointly with Plaintiffs’ counsel to request the adjournment of the Initial Conference currently scheduled September 4, 2024, until September 25, 2024, or a date thereafter when the Court is available to conduct the Initial Conference. This is the parties’ first joint request to adjourn the initial conference in this case.

As the Court knows, the parties have been engaged in briefing relating to Plaintiffs’ pending application for a preliminary injunction and the Court has scheduled a hearing concerning Plaintiffs’ application for September 3, 2024, the day before the currently scheduled date for the Initial Conference. The parties have been focused on preparing their respective submissions with respect to Plaintiffs’ application for a preliminary injunction and would appreciate additional time to meet, confer and prepare a joint proposed Civil Case Management Plan and Scheduling Order (“CMP”) and accompanying joint letter.

Accordingly, the parties jointly respectfully request the adjournment of the Initial Conference until September 25, 2024, or a date thereafter when the Court is available. The parties

also request the extension of the time to file a proposed CMP and accompanying joint letter until one week before the date selected for the Initial Conference.

The parties thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Daniel R. Perez

Daniel R. Perez
Assistant Corporation Counsel

cc: All counsel of record (via ECF)